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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Pamela Brown, Individually, and as Special
Administratrix of the Estate of James
Brown,

Plaintiffs,

v.

United States of America,
Defendant.

Case No. 2:20-cv-01814-CDS-DJA

**Stipulation to Extend Remaining
Deadlines (Sixth Request)**

Pursuant to Local Rule 26-4 and Local Rule IA 6-1, the parties respectfully request a 60-day extension of the remaining deadlines. This is the sixth request for an extension of time.

A. Discovery completed to date

This is a complex medical malpractice wrongful death case. The parties have provided disclosures, exchanged written discovery, including numerous medical records, and subpoenaed multiple third parties. The parties have deposed the plaintiff, other family members of the decedent, and three of the medical providers who treated the decedent. The deadlines for amendment and to add parties have passed. The parties have closely cooperated to move discovery forward.

B. Remaining Discovery

The parties have completed fact witness depositions and written discovery. The main task remaining in discovery is conducting the expert witness deposition of Plaintiff's expert, Dr. MacGregor.

C. Reasons for Requested Extension

Plaintiff's expert, Dr. MacGregor has a demanding schedule and limited availability. The parties cooperated to find mutually agreeable dates for his deposition and scheduled it for November 4, 2022. Unfortunately, counsel for the United States' father passed away on October 28, 2022, and he was required to cancel the deposition to attend the funeral. Dr. MacGregor and Plaintiff's counsel have been accommodating, but the parties have been unable to find another date for the deposition within the discovery period.

Given the approaching holidays and various scheduling conflicts, the parties respectfully request an additional 60 days to complete Dr. MacGregor's deposition. They are seeking this extension in good faith and without purpose of delay.

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D. Proposed revised discovery schedule

	Current due date	Proposed due date
Discovery Cut-Off	November 22, 2022	January 23, 2023
Dispositive Motions	December 27, 2022	February 27, 2023
Pre-Trial Order	January 23, 2022	March 20, 2023

Respectfully submitted this 21st day of November 2022.

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Attorney for Plaintiff

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IT IS SO ORDERED.


 UNITED STATES MAGISTRATE JUDGE

DATED: 11/23/2022